

**EXHIBIT C**  
**(November 2023 Emails)**

**Wes Rahn**

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**Subject:** FW: CCG v. CCBOER

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**From:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>  
**Sent:** Tuesday, November 21, 2023 6:00 PM  
**To:** Wes Rahn <[wrahn@olivermaner.com](mailto:wrahn@olivermaner.com)>; Halsey G. Knapp, Jr. <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>  
**Cc:** Marilyn Marks <[marilyn@uscgg.org](mailto:marilyn@uscgg.org)>; Ben Perkins <[bperkins@olivermaner.com](mailto:bperkins@olivermaner.com)>; Jennifer Dorminey Herzog <[jherzog@hallboothsmith.com](mailto:jherzog@hallboothsmith.com)>  
**Subject:** RE: CCG v. CCBOER

Wes: I thought we made clear on the pre-hearing conf call with you guys before the last hearing that we did not raise the issue again After August 26 because the videos were made known on August 26, and we spent all of our time on analyzing those (which took a lot of time) before the Sept 1 30b6. After the 30b6, we did not pursue the matter until the revelations regarding all of the emails and documents the GBI located on the CCBOER desktop and this action was filed.

**Cary Ichter, Partner**  
**Ichter Davis, LLC**  
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phone 404.869.5243  
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**From:** Wes Rahn <[wrahn@olivermaner.com](mailto:wrahn@olivermaner.com)>  
**Sent:** Tuesday, November 21, 2023 4:59 PM  
**To:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Halsey G. Knapp, Jr. <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>  
**Cc:** Marilyn Marks <[marilyn@uscgg.org](mailto:marilyn@uscgg.org)>; Ben Perkins <[bperkins@olivermaner.com](mailto:bperkins@olivermaner.com)>; Jennifer Dorminey Herzog <[jherzog@hallboothsmith.com](mailto:jherzog@hallboothsmith.com)>  
**Subject:** RE: CCG v. CCBOER

Halsey/Cary,

Can you please produce the requested written objections? If no written objections to the privilege log were made after August 26, 2022, please let us know.

Thanks,

**Wes Rahn**



218 West State Street (31401)  
P.O. Box 10186  
Savannah, Georgia 31412  
(912) 236-3311 *telephone*  
(912) 236-8725 *facsimile*

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**From:** Wes Rahn

**Sent:** Friday, November 17, 2023 2:37 PM

**To:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Halsey G. Knapp, Jr. <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>

**Cc:** Marilyn Marks <[marilyn@uscgg.org](mailto:marilyn@uscgg.org)>; Ben Perkins <[bperkins@olivermaner.com](mailto:bperkins@olivermaner.com)>; Jennifer Dorminey Herzog <[jherzog@hallboothsmith.com](mailto:jherzog@hallboothsmith.com)>

**Subject:** RE: CCG v. CCBOER

Halsey/Cary,

See highlight below for question regarding objections to the privilege log.

If no written objections to the privilege log were made after August 26, 2022, please let us know.

Thanks,

**Wes Rahn**



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P.O. Box 10186  
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**From:** Wes Rahn

**Sent:** Thursday, November 16, 2023 5:54 PM

**To:** Cary Ichter <[CIchter@IchterDavis.com](mailto:CIchter@IchterDavis.com)>; Ben Perkins <[bperkins@olivermaner.com](mailto:bperkins@olivermaner.com)>

**Cc:** Marilyn Marks <[marilyn@uscgg.org](mailto:marilyn@uscgg.org)>; Bruce Perrin Brown Esq. ([bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)) <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; Halsey G. Knapp, Jr. <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>; [sparks@khlawfirm.com](mailto:sparks@khlawfirm.com); Rob McGuire <[ram@lawram.com](mailto:ram@lawram.com)>; Jill Connors <[JConnors@IchterDavis.com](mailto:JConnors@IchterDavis.com)>; Jennifer Dorminey Herzog <[jherzog@hallboothsmith.com](mailto:jherzog@hallboothsmith.com)>; Nick Kinsley <[NKinsley@hallboothsmith.com](mailto:NKinsley@hallboothsmith.com)>; Anthony A. Rowell <[ARowell@hallboothsmith.com](mailto:ARowell@hallboothsmith.com)>

**Subject:** RE: CCG v. CCBOER

Good evening Cary,

I wanted to let you know that the GBI's attorney, Tina Piper, reached out to us regarding CCBOE's subpoena to the GBI.

Ms. Piper offered the following proposal:

- The GBI will provide a written response to our subpoena stating that everything the CCBOE requested is in a forensic image of Ms. Hampton's desktop.
- The GBI will produce (1) the forensic image and (2) an unredacted version of the GBI report.
- However, both will only be produced if the CCBOE agrees to a protective order that will cover the entire production and continue until the criminal cases are prosecuted.

Since the CCBOE agreed to work with the Coalition on subpoenas, we wanted to run this proposal by you before making any decision.

On a separate note, on the status call yesterday, you stated that the Coalition would provide objection(s) to the privilege log that were purportedly made after the privilege log was supplemented with dates on or about August 26, 2022. Can you please provide those at your earliest convenience?

Thanks,

**Wes Rahn**



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